ARGUMENTS/REMARKS

Applicants would like to thank the Examiner for the careful consideration given the present application, and for the personal interview conducted on October 27, 2004. The application has been carefully reviewed in light of the Office action and the interview, and amended as necessary to more clearly and particularly describe and claim the subject matter which applicants regard as the invention.

Claims 1-35 remain in this application.

At the personal interview, applicant's representative argued that the finality of the rejections was not proper, because claim 18 had been amended merely for editorial reasons, and thus the amendments could not have necessitated the new rejection. The Examiner agreed to reopen prosecution based on this claim, after confirming that the claim 18 had no substantive changes in the amendment of record, which was not available to the Examiner at the time of the interview.

Claims 1-17 and 20 were rejected under 35 U.S.C. §112, second paragraph, as being indefinite for using the term and/or. At the personal interview, it was argued that the use of the term and/or was neither improper nor indefinite. However, at the Examiner's insistence, applicant has amended the claims to remove the term. Accordingly, the rejection is moot.

Claim 25 was rejected under 35 U.S.C. §102(e) as being anticipated by Gelman *et al.* (U.S. 6,415,329). For the following reasons, the rejection is respectfully traversed.

Claim 25 recites a method by which a terminal can access a server with the terminal sending a request for the server to a gateway, wherein "security utilized between said terminal and said gateway is based on a first *security* protocol...including an *encryption*" and wherein the server is secured "with a second *security* protocol...also including an *encryption*" (emphasis added). The method includes the step of "*converting* between said first and said second security protocol in a secured domain of said server", wherein "*encrypted* packets sent by said terminal are routed by said gateway to said secured domain *without* said gateway

decrypting *all* of the packets transmitted during a session" (emphasis added).

The Examiner states that Gelman teaches converting from a first security protocol to an second security protocol at col. 31, lines 50-65, and at col. 7, lines 15-30. However, as was pointed out at the personal interview, Gelman teaches changing from a TCP protocol to a WLP protocol (first referenced section) or converting a TCP protocol to a non-TCP protocol (second referenced section). There is no suggestion that the TCP protocol is encrypted. In fact, one skilled in the art would know that the TCP protocol standard, by itself, is not a security standard and does not use, by default, an encryption. Thus, there is no teaching of converting between a first security protocol using an encryption to a second security protocol using an encryption.

Accordingly, claim 25 is patentable over Gelman.

Claims 1-24 and 26-35 were rejected under 35 U.S.C. §102(e) as being anticipated by Lincke *et al.* (U.S. 6,253,326). For the following reasons, the rejection is respectfully traversed.

Claim 1, as amended, recites a method for a terminal sending requests to a server via a gateway including the step of "converting between WTLS and said one or both of the SSL or the TLS security protocol in a secured domain of said server administrated by an administrator" wherein "WTLS encrypted packets sent by said terminal are routed by said gateway to said secured domain without said gateway decrypting all of the encrypted packets transported during a session".

However, as discussed at the personal interview, Lincke does not suggest the use of WTLS encrypted packets. Furthermore, as also discussed, the Examiner cited col. 111, lines 15-25 as teaching converting between WTLS to SSL and/or TLS security protocols, but a reading of the cited passages does not support such a teaching. Instead, the passage merely discusses support for SSL and S-HTTP protocols, without any teaching of converting from WTLS to one of the supported protocols. Applicant could find no discussion anywhere in the reference for converting from one security protocol to another security protocol, each with an encryption.

Accordingly, claim 1 is patentable over the reference for the above reasons. Claims 2-17, which depend, directly or indirectly, on claim 1, are thus patentable over the reference for at least the same reasons.

Claim 19 recites similar limitations to claim 1, reciting a gateway including "means for transmitting said SSL-encrypted requests to a receiving server, wherein said gateway can recognize WTLS-encrypted packets that are to be sent on transparently and can convert said WTLS-encrypted packets into said SSL-encrypted request without decrypting the information contained in said WTLS-encrypted packets". Thus, claim 19 is patentable over the reference for at least the same reasons as claim 1. Furthermore, claim 19 recites that it is the gateway that performs the conversion. The Examiner has cited no gateway capable of performing the listed conversion. Thus, claim 19 is patentable over the reference for this reason as well.

Claims 20-24, which depend, directly or indirectly, on claim 19, are thus patentable over Lincke for at least the same reasons.

Claim 18, as amended, recites a method by which a mobile user with a WAP-enabled terminal can access a WEB or WAP server, with the method comprising the steps of

-said terminal sending a request for said server to a WAP gateway, wherein a browser in said terminal extracts the port number of the demanded WEB or WAP page and copies it to packets sent to said gateway; and

-routing said packets, using said gateway, according to this port number

Lincke does not suggest these steps of the claim.

At the personal interview, it was discussed whether or not it was known in the art for a router to forward packets based on a port number. However, claim 1 specifically recites that it is a *browser* on the WAP-enabled *terminal* which extracts a port number and copies it to the packets. One skilled in the art would know that this is not a feature of state-of-the-art browser applications at the priority date of this application. Thus, the claim is patentable over the reference for this reason, whether

or not it is known to forward packets based on an embedded port number.

Claim 26 recites a request path of a "terminal generating a request including request packets encrypted using a WTLS protocol" through a gateway for "forwarding said request to said server or to another server, wherein said gateway does not decrypt all of said request packets" to a server "decrypting some number of said request packets using said WTLS protocol". Claim 26 also recites a data path of said server or another server "serving data to said terminal via said gateway" also using the WTLS protocol, wherein "said gateway does not decrypt all of said data packets".

As discussed above and at the personal interview, there is no suggestion in Lincke of using the WTLS protocol. Thus, claim 26 is patentable over the reference for this reason. Further, there is no suggestion of transmitting requests or data through a gateway without decrypting all of the WTLS encrypted packets. Thus, for this reason as well, claim 26 is patentable over the reference.

Claims 27-30, which depend, directly or indirectly, on claim 26, are thus patentable over the reference for at least the same reasons.

Claim 31 recites a server and gateway similar to that in claim 26, using a WTLS encryption, wherein the gateway forwards said data to said terminal "without decrypting all of said data packets". Thus, claim 31 is patentable over the reference for similar reasons as claim 26. Claims 32-35, which depend, directly or indirectly, on claim 31, are thus patentable over the reference for at least the same reasons.

In consideration of the foregoing analysis, it is respectfully submitted that the present application is in a condition for allowance and notice to that effect is hereby requested. If it is determined that the application is not in a condition for allowance, the examiner is invited to initiate a telephone interview with the undersigned attorney to expedite prosecution of the present application.
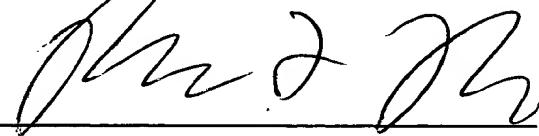
If there are any additional fees resulting from this communication, please charge same to our Deposit Account No. 16-0820, our Order No. 33544US1.

Respectfully submitted,

PEARNE & GORDON, LLP

By: _____

Robert F. Bodi, Reg. No. 48,540

1801 East 9th Street, Suite 1200
Cleveland, Ohio 44114-3108
(216) 579-1700

November 5, 2004